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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
Administration of the )  
North American Numbering Plan )

CC Docket No. 92-237  
Phase I and II

ORIGINAL  
FILE

COMMENTS OF THE  
NATIONAL TELEPHONE COOPERATIVE ASSOCIATION

The National Telephone Cooperative Association ("NTCA") submits these Comments pursuant to the Notice of Inquiry, FCC 92-470, released by the Commission on October 29, 1992, in the above-captioned proceeding ("NOI"). This inquiry is intended to explore long range issues related to the administration of the North American Numbering Plan ("NANP"). NTCA is a national association of approximately 480 small local exchange carriers ("LECs") providing service to subscribers and interexchange carriers across rural and small town America. Decisions in both phases of this proceeding will have a direct impact on NTCA members.

Phase I involves the question of how the NANP should be administered.<sup>1</sup> NTCA suggests that the Commission should explore a range of alternatives that lead to increased input from a wider range of interested parties but at the same time maintain a level of policy guidance consistent with the public interest. Moving the administration fully to an industry-controlled body would be difficult given the number and changing slate of interested parties and the difficulty such a structure would present in translating the public interest. The outcome of what are bound

<sup>1</sup> NOI at para. 22.

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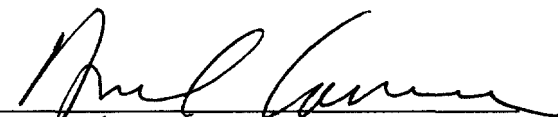
to be hundreds of controversial numbering issues expected to arise in the next decade and beyond should not be surrendered to an incapable entity or an inefficient process that does not recognize the public's interest. This NOI should be the first step in investigating these concerns.

Phase II of this proceeding will examine the cost and benefits of, and possible alternatives to, the expansion of the Carrier Identification Code ("CIC") to four digits, and the administration of already scarce codes. NTCA's member telcos are concerned with the level of costs that could potentially be incurred for switching software changes, possible switch replacements, and other changes to accommodate the expansion to four-digit CICs. These changes have the potential for an extraordinary expense to the industry that warrants a careful approach that balances the many concerns. This NOI should begin to quantify the relative trade-offs between cost, implementation schedules, and allocation of scarce codes.

Respectfully submitted,

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December 28, 1992

CERTIFICATE OF SERVICE

I, Rita H. Bolden, certify that a copy of the foregoing Comments of the National Telephone Cooperative Association in CC Docket No. 92-237, Phase I and II was served on this 28th day of December 1992, by first-class, U.S. Mail, postage prepaid, to the following persons on the attached list.

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